

SHPIGEL LAW, P.C.

Attorneys At Law

250 Greenwich Street

46th Floor

New York, New York 10007

Phone (212) 390-1913 Fax (646) 355-0242

E-Mail: ishpigel@iselaw.com

June 1st, 2021

VIA ECF

The Honorable Kevin N. Fox
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Bilalov v. Herman Gref Et., al., Dkt. #:20-Civ-09153(AT)(KNF)

Dear Judge Fox,

The undersigned represents Plaintiff Akhmed Gadzhievich Bilalov in the above-referenced case. We write according to Rule 1.E of Your Honor's Individual Practice and Rules to respectfully request a three (3) day extension of time to file a motion for leave to amend the complaint, currently due June 1st, 2021.

The deadline to file a motion for leave to amend the complaint is today. Plaintiff is respectfully requesting that its deadline be extended three (3) days i.e., up to and including June 4th, 2021. The reason for the request is that the undersigned needs additional time to review documents that were just received this afternoon that support further amendments to the current complaint and shed light on additional allegations regarding the jurisdictional components of Plaintiff's claims.

Plaintiff sought leave of Court to file and serve a Second Amended Complaint by letter motion on May 20th, 2021. The Court denied the letter motion on May 21st, 2021, and ordered Plaintiff to file a motion for leave to amend the complaint by June 1st, 2021 [Dkt. 31].

We have conferred with counsel for Defendants concerning this request before filing the May

20th, 2021 letter motion. Counsel for Defendants consented to extend Plaintiff's time to file the Amended Complaint to June 21st, 2021. [Dkt. 30].

There have been no previous requests to extend the deadline to file the motion for leave to amend the complaint. This request does not impact any other deadlines in this case.

We greatly appreciate Your Honor's time and consideration in this matter.

Respectfully,

/S/Irina Shpigel
Irina Shpigel